



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

JUL 29 2014

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**TRACKING NO. 7011 0110 0001 3590 2706**

Mr. Steven J. Ginski  
Chief Counsel – Health Safety & Remediation  
International Paper Company  
6400 Poplar Avenue  
Memphis, Tennessee 38197

McGinnes Industrial Maintenance Corporation  
c/o Mr. Albert R. Axe, Jr.  
Winstead PC  
401 Congress Avenue, Suite 2100  
Austin, Texas 78701

RE: Demand/Bill for Collection  
San Jacinto River Waste Pits Superfund Site (06ZQ)  
Channelview, Harris County, Texas  
CERCLA Docket No. 06-12-10

Dear Messrs. Ginski and Axe:

This letter is regarding the San Jacinto River Waste Pits Site (Site) and costs incurred by the U.S. Environmental Protection Agency (EPA) in the on-going implementation of its responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 United States Code §9601 et seq. Pursuant to the provisions of Section XV Paragraph 66 "Payment of Future Response Costs" of the Administrative Settlement Agreement and Order on Consent for Removal Action (Settlement Agreement), CERCLA Docket No. 06-12-10, demand is hereby made upon International Paper Company and McGinnes Industrial Maintenance Corporation (Respondents) for reimbursement of response costs incurred by the EPA. This billing covers costs incurred during the period of May 17, 2010, through May 21, 2014. Enclosed with this letter is an accounting of costs in the amount of \$481,220.24 as well as an accounting spreadsheet with calculation for personnel costs identified that are not applicable for reimbursement pursuant to the removal Settlement Agreement. Payroll and associated indirect costs for four EPA employees reflect a 50% adjustment of their total oversight costs charged. Therefore, with the adjustment for remedial costs in the amount of \$62,986.62, the amount now due is **\$418,233.62**. Also enclosed is a bill for the amount. An estimate of the next annual billing is approximately \$160,000 and will be sent around July 2015.



For your information enclosed is an accounting of all costs, including Remedial Investigation/Feasibility Study costs, for this timeframe in the amount of \$2,634,558.83. This report was used in determining applicable costs for reimbursement.

Payment shall be made by Electronic Funds Transfer (EFT) **referencing the "EPA Hazardous Substances Superfund"** within thirty (30) days of receipt of this billing and transmitted to the following address:

Federal Reserve Bank of New York  
ABA = 021030004  
Account = 68010727  
33 Liberty Street  
New York, New York 10045  
Field Tag 4200 of the Fedwire message should read "D68010727 Environmental Protection Agency"

CERCLA Docket No. 06-12-10 and San Jacinto River Waste Pits (06ZQ) must be clearly typed on the transmittal to ensure credit.

You must send simultaneous notice of such payment by email to [acctsreceivable.cinwd@epa.gov](mailto:acctsreceivable.cinwd@epa.gov), and to the following, including a copy of the EFT notification:

EPA Cincinnati Finance Office  
26 Martin Luther King Drive  
Cincinnati, Ohio 45268

and to

Chief, Enforcement Assessment Section (6SF-TE)  
US EPA, Region 6  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Your adherence to these procedures will ensure proper credit when payment is received. If the EPA does not receive payment within thirty (30) days of the Respondents' receipt of the bill, interest will accrue on the amount due from the date of the bill at the current annual rate prescribed and published by the Secretary of the Treasury Fiscal Requirements Manual Bulletin per annum through the date of payment. Interest will be compounded annually at a new rate every October 1st of the year.


If dispute resolution is invoked, for the purposes of interest calculation, the due date for the disputed amount is the date of final resolution of the dispute.

Please take note that an obligation of a potentially responsible party to reimburse the United States for response costs incurred by the government in performing a response action at the Site constitutes a "debt" as the term is defined under the Federal Debt Collection Procedures Act, 28 U.S.C. §3002. Any act to obstruct the EPA's efforts to collect funds from you may be considered as a violation of the

provisions of the Federal Debt Collection Act. Other penalties for failure to make a timely payment may also apply.

If you have any questions regarding this billing or the enclosures, please contact Doretha Christian at (214) 665-6734. If you have any technical questions, please contact Valmichael Leos at (214) 665-2283. Thank you for your cooperation.

Sincerely yours,

  
for Lydia Johnson  
Chief  
Enforcement Assessment Section

Enclosures (4)

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
McGinnes Industrial Maintenance Corp.  
c/o Mr. Albert R. Axe, Jr.  
Winstead PC  
401 Congress Avenue, Suite 2100  
Austin, TX 78701

2. Article Number  
(Transfer from service label) 7010 2780 0002 4355 1511

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

**COMPLETE THIS SECTION FOR ADDRESSEE**

A. Signature  
X *[Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name) *Jeremy Gore* Date of Delivery *8-1-14*

D. Is delivery address different from item 1? ☐ Yes ☐ No  
If YES, enter delivery address below:

3. Service Type  
☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage \$  
Certified Fee  
Return Receipt Fee (Endorsement Required)  
Restricted Delivery Fee (Endorsement Required)

Total McGinnes Industrial Maintenance Corp. 2014  
c/o Mr. Albert R. Axe, Jr.  
Winstead PC  
401 Congress Avenue, Suite 2100  
Austin, TX 78701

PS Form 3800, August 2006 See Reverse for Instructions

UNITED STATES POSTAL SERVICE

TX 797  
01 AUG '14  
PM 2 L



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

U.S.  
Environmental Protection Agency  
Region VI (6SF-TE)  
1445 Ross Ave.  
Dallas, TX 75202-2733

RECEIVED  
14 AUG -8 PM 1:46  
SUPERFUND DIV.  
DIRECTOR'S OFF.  
*[Signature]*

102273099

**Certified Mail Provides:**

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

**Important Reminders:**

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

**IMPORTANT: Save this receipt and present it when making an inquiry.**

PS Form 3810, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <i>K. Halleney</i></p> <p>B. Received by (Printed Name) <i>K. Halleney</i></p> <p>C. Date of Delivery <i>8/14/14</i></p> <p>D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>1. Article Addressed to:</p> <p>Mr. Steven J. Ginski Chief Counsel – Health Safety &amp; Remediation International Paper Company 6400 Poplar Avenue Memphis, TN 38197</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7011 0110 0001 3590 2706</p>			

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

U.S. Postal Service™	
<p><b>CERTIFIED MAIL™ RECEIPT</b> (Domestic Mail Only; No Insurance Coverage Provided)</p> <p>For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a></p>	
<p><b>OFFICIAL USE</b></p>	
<p>Postage \$</p> <p>Certified Fee</p> <p>Return Receipt Fee (Endorsement Required)</p> <p>Restricted Delivery Fee (Endorsement Required)</p>	<p>JUL 29 2014</p> <p>Postmark Here</p>
<p>Total</p> <p>Mr. Steven J. Ginski Chief Counsel – Health Safety &amp; Remediation International Paper Company 6400 Poplar Avenue City: Memphis, TN 38197</p>	

PS Form 3800, August 2006

See Reverse for instructions

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

U.S.  
Environmental Protection Agency  
Region VI (6SF-TE)  
1445 Ross Ave.  
Dallas, TX 75202-2733

*K. EDDINS*

*San Jacinto*

RECEIVED  
AUG 11 PM 2:00  
SUPERFUND DIV.  
DIRECTOR'S OFF.

### Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

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- Certified Mail is *not* available for any class of international mail.
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- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
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**IMPORTANT: Save this receipt and present it when making an inquiry.**

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SAN JACINTO RIVER WASTE PITS, CHANNELVIEW, TX SITE ID = 06ZQ  
Removal AOC Oversight Costs Bill

<u>Employee Name</u>	<u>Hours</u>	<u>Payroll Costs</u>	<u>Indirect Costs</u>	<u>Grand Total</u>
Foster, Marcia	178.75	\$13,395.15	\$5,718.01	
Hernandez, Jessica	663.00	\$27,298.11	\$11,717.37	
Nann, Barbara	628.00	\$45,838.52	\$19,272.71	
Salinas, Amy	25.75	\$1,921.12	\$812.25	
Subtotal	1495.50	\$88,452.90	\$37,520.34	
50% Adjustment		\$44,226.65	\$18,760.17	
Total		\$44,226.45	\$18,760.17	\$62,986.62


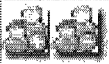
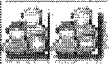










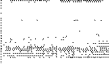
Bill For Collection	Bill Number 2761426S0055
Bureau/Office for Remittance Payable U.S. ENVIRONMENTAL PROTECTION AGENCY - REGION 6	Date JUL 29 2014
Address For Mailing Payment P.O. BOX 979076 St. Louis, MO 63197-9000	Bill Amount \$418,233.62

PAYER

Steven J. Ginski  
Chief Counsel - Health Safety & Remediation  
International Paper Company  
6400 Poplar Avenue  
Memphis, Tennessee 38197

McGinnes Industrial Maintenance Corporation  
c/o Albert R. Axe, Jr.  
Winstead PC  
401 Congress Avenue, Suite 2100  
Austin, Texas 78701

DATE	DESCRIPTION		AMOUNT
	<p>To bill you for the response cost for the period 05/17/2010 through 05/21/2014 under CERCLA Docket No.06-12-10, San Jacinto River Waste Pits Superfund Site (06ZQ). Reference attached letter from EPA Region 6, Enforcement Assessment Section.</p> <p>Payment is due within thirty (30) days of receipt of this billing.</p>		\$418,233.62
Important:	<p>A receipt will be issued for all cash remittances when required by applicable procedures. Failure to receive a receipt for cash payment should be reported to the office shown above.</p> <p>EPA Contact: Doretha Christian 214-665-6734</p>	AMOUNT DUE	\$418,233.62

<b>Routing and Concurrence Slip</b>		<b>Begin Routing Date:</b> 07/10/2014
<b>Routing Status:</b> Closed 		
<b>To: (Name, office symbol, route number, building, Agency/Post</b>	<b>Initials</b>	<b>Date</b>
 1. Doretha Christian	DC	07/23/2014
 2. Linda Brewer	LB	07/15/2014
 3. Robert Werner	RW	07/15/2014
 4. Valmichael Leos	VL	07/22/2014
 5. Amy Salinas /s Anne Foster	AF	07/23/2014
 6. Anne Foster	AF	07/23/2014
 7. David McQuiddy	DM	07/23/2014
 8. Ben Banipal	BB	07/23/2014
 9. Mark Peycke /s Edwin Quinones /s Edwin Quinones Edwin Quinones	EQ	07/24/2014
 10. Carlene Chambers	CC	07/23/2014
 11. Lydia Johnson /s Kevin Shade /s Kevin Shade Kevin Shade	KS	07/28/2014
 12. Karen Eddins	KE	07/28/2014
 13.		
<b>Office:</b>	<input type="checkbox"/> Enforcement Assessment Section	
<b>Tracking Category:</b>	<input type="checkbox"/> Demand/Billing Letter/Bill for Collection	
<b>Enforcement Confidential:</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No	
<b>Email Subject:</b>	San Jacinto River Waste Pits (06ZQ) Cost Recovery Demand/Bill for Collection	
<b>Due Date:</b>	07/21/2014	
<b>DD/DDD Assigned:</b>		
<b>DD/DDD Status:</b>	Pending	
<b>DD/DDD Remarks:</b>		
<b>Front Office Assigned:</b>		

- |   |   |   |   |
|---|---|---|---|
| <input type="checkbox"/> Action                 | <input type="checkbox"/> Coordination         | <input type="checkbox"/> Justify          | <input checked="" type="checkbox"/> Signature |
| <input checked="" type="checkbox"/> Approval    | <input type="checkbox"/> File                 | <input type="checkbox"/> Note and Return  | <input type="checkbox"/> AD Signature         |
| <input type="checkbox"/> As Requested           | <input type="checkbox"/> For Clearance        | <input type="checkbox"/> Per Conversation | <input type="checkbox"/> DD/DDD Signature     |
| <input checked="" type="checkbox"/> Circulate   | <input type="checkbox"/> For Correction       | <input type="checkbox"/> Prepare Reply    | <input type="checkbox"/> RA Signature         |
| <input type="checkbox"/> Comment                | <input type="checkbox"/> For Your Information | <input type="checkbox"/> Review           |   |
| <input checked="" type="checkbox"/> Concurrence | <input type="checkbox"/> Investigation        | <input type="checkbox"/> See Me           |   |

**Remarks:**

Please contact Doretha Christian (6734) with any comments or concerns

**From: (Name, org, symbol, Agency/Post)**

Karen Eddins

**Room No./Bldg:** 6SF-TE

**Phone Number:** 214.665.2227

**Choose EDIT document and turn on Track changes in WORD.**

**Remember to SAVE the Word Document before exiting Word.**

**Then Click on Save & Exit or Save and Route Next.**

**Otherwise your changes will not be saved.**

**For Signature :**  
**Choose EDIT document**



- San Jacinto Demand Bill for Collection.docx

**Inquiry/Supporting Documents:**



- San Jacinto 06ZQ 50% payroll.xlsx



- San Jacinto All Costs SCORPIOS Sur



051710-052114.pdf  
- SanJacinto Removal AOC Oversight Costs 051710-052114.pdf

**Final Document(s):**

**DO NOT ATTACH DOCUMENTS BELOW HERE!**  
**USE THE ATTACH DOCUMENT BUTTON!**